



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
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ER

PROGRESS POLLUTION REPORT LIBBY ASBESTOS Libby, Lincoln County, Montana

I. HEADING

Date: October 28, 2002
Site Name: Libby Asbestos Site
From: Paul Peronard, OSC
Duc Nguyen, OSC
To: Kevin Mould, EPA Headquarters
POLREP No.: #5

II. BACKGROUND

Site No.: BC
Response Authority: CERCLA
CERCLIS No: MT0009083840
NPL Status: NA
Action Memorandum Status: Approved 5/23/00 ✓
Action Memorandum Amendment: 08/13/01 ✓
Action Memorandum Amendment: 05/09/02

Start Date (OU 00-General Site) Fund-Lead: 06/01/00 ✓
Completion Date(OU 00 General Site)Fund-Lead: TBD

Start Date (OU 01-Export Plant) Fund-Lead: 06/01/00 ✓
(UAO & on-going--PRP-Lead): 06/05/00 ✓
Completion Date (OU 01 - Export Plant) Fund-Lead: TBD
(PRP Lead): TBD

Start Date (OU 02 - Screening Plant)Fund-Lead: 06/01/00 ✓
Completion Date (OU 02 Screening Plant) Fund-Lead: TBD

Start Date (OU 03 Rainy Road)Fund-Lead: 05/01/01 ✓
Completion Date (OU 03 Rainy Road) Fund-Lead: TBD

Start Date (OU 04 - Residential/Business Screening) Fund-Lead: TBD
Completion Date:(OU 04 - Residential/Business Screening) Fund-Lead: TBD



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Start Date (OU 05 - Stimson Lumber Company) Fund-Lead: TBD

Completion Date:(OU 05 - Stimson Lumber Company) Fund-Lead: TBD

Start Date (OU 06 - BNSF) PRP - Lead: 10/21/02

Completion Date:(OU 06 - BNSF) PRP - Lead: TBD

III. SITE INFORMATION

A. Incident Category

Time Critical, Fund-Lead and PRP-Lead

B. Site Description (Please see the initial POLREP)

1. Site Location

The Site is located in Montana within Sections 3 and 10, T.30N.,R.31W. of the Libby Quadrangle in the County of Lincoln.

2. Description of Threat

(Please see the POLREPs 1 - 4)

C. Preliminary Assessment/Site Inspection Results

(Please see the POLREPs 1 - 4)

IV. RESPONSE INFORMATION

A. Situation

1. Removal actions to date:

OU-00 - General Site:

The KDC Bluffs: *This 64-acres site is located across the Kootenai river from the former Screening Plant, known as part of the KDC properties. The removal action for this area is 80% complete and a total of approximately 20,000 cubic yards has been excavated and hauled to the mine. Removal of remaining 20% of asbestos contaminated soil is expected to be completed in Spring 2003.*

The KDC Flyway: *This approximately 20-acres site is located immediately south of the former Screening Plant, also known as part of the KDC properties. The site is currently vacant and adjacent to the "River Run Through It" residential area. The site access has been restricted to the public. The removal of asbestos-contaminated soil is 40% complete. Removal of the remaining 60% (36 grids)*

of asbestos contaminated soil and restoration are expected to be completed in 2003. Contractor's bonding issues and harsh weather have caused a delay in removal actions.

Landfill Cell: *Construction of the landfill cell is complete, ahead of schedule and under budget. Minor dress work is being done to enhance entry and egress. A cooperative agreement for use of the cell and the Operating and Maintenance Plan (O&M) are still in the works with Lincoln County. This 13-individual-cells is located at the Lincoln County Landfill and has a capacity to store approximately 130,000 cubic yards of asbestos containing materials and ZAI..*

Schools:

- **Plummer Elementary School:** *Removal Action was completed last year. However, a small area was recently discovered with the visible exfoliated vermiculite. Removal of this area was completed in October 2002.*
- **Libby Middle School:** *All asbestos-soil contamination has been removed (6,633 cubic yards of contaminated soil), and the site including the running track has been completely restored.*
- **Libby High School:** *Removal of all contaminated soil (approximately 6,500 cubic yards) has been completed. All buildings and unsalvageable athletic equipment also have been decontaminated. Due to the weather, the rubberized track will not be installed until next Spring of 2003.*

Residential Removal Actions: The Removal Program has initiated this work since last year and plans to finish clean ups at 50 residence or commercial properties by the end of 2002. A second contractor, Environmental Restoration L.L.C. under ERRS I, is being brought on-line to expedite clean-ups. This year, EPA is focusing initially on those properties with high asbestos levels, especially in soil so that the soil removal can be completed before the onset of winter. Most removal work generally involves in the sequence of soil, ZAI, and then interior dust cleaning and will continue through the winter. In general, the garden and yard soils contained amphibole asbestos at levels of 2 to 15%, dust in home found with significant levels of amphibole asbestos fibers ranging from 5,000 to 257,000 s/cm². Some properties have various vermiculite wastes containing amphibole asbestos greater than 5% by PLM. At some properties, a large amount of "tremolite" rocks and fragments also found in the rock garden area or decorated around the house.

Residence/Commercial Buildings	Removal Activities	Completion Date
Brown-Lee	Soil (2% by PLM).	Fall 2001
Calhoun	Soil (>2% by PLM) and vermiculite ores	Spring 2001
Burris	Tremolite rocks (>35% by PLM)	Fall 2001

Libby Community Health Center	Dust	Fall 2001
Johnson	Tremolite rocks (>35% by PLM)	Fall 2001
Foote	ZAI and dust	Spring 2001 (Pilot Project)
Siefkie	Asbestos-contaminated buildings and dust, mining equipment, and vermiculite ores found in the yard and garden area.	Nov. 2001 (90% completed in 2001. Negotiating with owner about restoration of a steel shed.)
Walker	vermiculite ores found in the basement, ZAI and interior dust.	Completed in 2001 - (Pilot Project)
Fryberger	ZAI and interior dust.	Completed in 2001
City of Libby (a vacant residence owned by the City of Libby)	ZAI	Completed in 2001 - Pilot Project.
Hoff	visible vermiculite (2% by PLM), ZAI, and interior clean-up	Completed in 9/2002
Champion Hall Road	A portion (approximately 300 feet) of this road located in the residential area was found with amphibole asbestos (>5% by PLM).	Completed in 9/2002
Spencer	soil (>4%)	Completed in 8/2002
Westfall	Garden (5%), vermiculite pile in yard (10%)	Completed in 8/2002
Sanderson	Yards (>3%), ZAI, Dust	Completed in 8/2002
Spencer Law Firm	Dust, visible vermiculite in the basement	Completed in 9/2002
Tempel	Yards (>3%)	Completed in 10/2002
Beaulieu	Contaminated leach field area	Completed in 10 2002

Export Plant (OU-01 Fund & PRP-Lead): *The new Planar building in which the Millwork West is to be relocated has been cleaned because contamination was detected in September of 2002. W.R. will begin to move the Planar and its ancillary at the existing Export Plant to the new building on October 22, 2002. EPA will decontaminate the Planar's ancillary equipment on the week of October 20, 2002 before moving to the new building. The old Planer Building will then be demolished and the asbestos-contaminated soil under the building footings will be subsequently removed. W.R. Grace and the City of Libby (Owner) has agreed that in lieu of replacing the buildings, W.R. Grace will install an 8-inch water line (fire hydrant) under the railroad line to the Site. This area is planned for industrial use when the clean-up is complete. The clean-up is expected to be completed by the end of October of 2002. The water line will be installed in Spring of 2003.*

The Screening Plant (OU-02): *All cleanup work is complete. Restoration activities, including reconstructing a portion Rainy Creek to improve the erosion control and the critical habitat, are taking place and should be completed by the end of this year except for seeding of topsoil and tree/shrub planting (Spring 2003). A delay was caused by final restoration agreement and cash settlement with the Parkers. Both agreements were worked out with Parkers in October of 2002. The total cleanup/restoration is anticipated to be completed in Spring of 2003.*

The Rainy Creek Road (OU-03): *Rainy Creek is contaminated with amphibole asbestos and generates significant airborne concentration of asbestos with traffic when the aggressive dust suppression is not used. The road was paved from the half-mile to the two-mile mark and completed on October 24, 2002. The asbestos-contaminated soil and debris from residential removal and the Flyway will be moved to the Debris Transfer Station located at the Amphitheater (at the two-mile marker) for transfer to the mine. The road remains closed to the public.*

Residential and Business Screening/Investigation (OU-04) (as of October 28, 2002): *EPA will complete the screening of all Libby homes and businesses in the South Lincoln County (Libby Valley) by the end of November 2002. There are approximately 700 remaining properties for screening by the reconnaissance team.*

<i>Total properties reconned:</i>	<i>3,281</i>
<i>Total properties sampled:</i>	<i>2,800</i>
<i>Total properties with only outdoor vermiculite:</i>	<i>1,012</i>
<i>Total properties with both indoor and outdoor vermiculite:</i>	<i>292</i>
<i>Total properties with ZAI:</i>	<i>15%</i>
<i>Total properties with soil contamination:</i>	<i>48%</i>

Stimson Lumber Mill (OU-05): *A former expansion plant operated until 1949*

and a nursery is also located on a portion of the Mill site. Sampling activities have been completed at the following locations:

- *Personal Air Sampling (September 2002): Fingerjoint Building, Central Maintenance, Logyard, and Plywood Plant.*
- *Ambient Air Sampling (September 2002): Central Maintenance, Plywood Plant, Fingerjoint Building, Parking Lot, and Logyard.*
- *Micro Vacuum Dust Sampling: Plywood Plant and Central Maintenance.*
- *Soil Sampling is scheduled to be conducted on October 17, 2002.*

Burlington Northern and Santa Fe Railroad (BNSF) Cleanup (OU-06): The BNSF has agreed to perform the cleanup at the Libby rail yards and its tracks under a consent order to address high levels of asbestos. *The BNSF's work plan and sampling plan were approved on October 25, 2002. The removal activities will be carried out as soon as a consent order is signed. EPA will be overseeing cleanup works and conducting air sampling.*

2. Enforcement

- *On May 9, 2002, the U.S. District Court located in Missoula, Montana approved a consent decree in which W.R. Grace will pay \$2.75 million to provide health care in Libby. This medical coverages, known as a Supplemental Environmental Project (SEP), will provide health care beyond those already provided in the W.R. Grace's medical plan for asbestos-related disease. The SEP agreement is part of a penalty settlement for failure to provide access for cleanup in Libby.*
- *The bankruptcy case is scheduled to proceed during November of 2002 in New York.*
- *The cost recovery trial is scheduled to begin in Missoula in January of 2003.*
- *A court hearing about removing ZAI may begin in June of 2003 in New York.*

3. National Priority List (NPL)

- *In January of 2002 Governor Judy Martz used the State of Montana's one-time privilege of naming the Site as its highest priority for designation to the NPL.*
- *In February of 2002, EPA proposed the Libby Asbestos Site to the NPL.*
- *On October 23, 2002, the Site was added to the NPL to receive federal funds for long-term cleanup. The State of Montana will share ten percent of the clean-up costs.*

B. Next Steps

- *Ambient air sampling results: A summary of ambient air samples collected to date is being compiled by CDM contractor and will be*

available to the public in October of 2002.

- **New soil analytical methods:** In addition to the existing PLM method (detection limit 0.5% asbestos), the Infrared Spectroscopy (detection limit 0.1% asbestos) and Scanning Electron Microscopic (detection limit 0.01% asbestos) methods are under development and being tested. These two techniques will potentially be available in January of 2003. These will reduce cost and time for sample analysis.
- **Timber logging:** The USFS, Lincoln County Commissioners, Plum Creek Logging Company, and local community have requested assistance to delineate the potential contamination areas in the surrounding areas of the Zonolite Mine in the Tug Gulch area where the cutting of timber has been proposed. These areas need to be tested for asbestos so that a decision can be made about harvesting the timber. Due to budget constraints and the primary focus on residential clean ups, EPA has agreed to provide only technical assistance in sampling.
- **Remedial Program:** A transition from the Removal Program to the Remedial Program is underway. The Remedial Program has conducted studies of the cancer risk model. EPA will fund animal studies to improve the model used to predict non-cancer risk. The results of these studies will be used in the feasibility study (FS) and record of decision (ROD) which is expected to be completed at the end of 2004.

C. **Key Issues**

- In addition to the depression of the lumber supply in Libby and 19 on-going work-related liability law suits against the Stimson Lumber Company, clean-up costs resulting from asbestos contamination could cause the company to shut-down. The Stimson Lumber Company is the largest employer in Libby and has approximately 275 employees.

V. **COST INFORMATION**

EXTRAMURAL COSTS	Current Ceiling (Action Memo - 5/02/02)	Cost to Date (10/02)

1. IAG - Volpe Center (DOT) \$18,090,000 funded.		
- Export Plant	\$ 121,000	\$ 150,000
- Screening Plant and other Removals	\$ 8,819,000	\$ 8,000,000
- Residential/Commercial Clean-ups	\$ 650,000	\$ 650,000
- Rainy Creek	\$ 1,500,000	\$ 500,000
- Schools	\$ 2,500,000	\$ 2,000,000
- Sampling including remedial investigation (\$4 millions)	\$ 4,500,000	\$ 4,000,000
Sub total	\$18,090,000	\$15,300,000
2. ERRS Contract (Environmental Restoration L.L.C.) \$1,577,000 funded.		
- Landfill Cell Construction	\$ 500,000	\$ 500,000
- Disposal Cost (committed to Lincoln C.)	\$ 800,000	\$ 800,000
- Residential/Commercial Properties	\$ 277,000	\$ 150,000
Subtotal	\$ 1,577,000	\$ 1,450,000
Subtotal Extramural	\$19,667,000	\$16,750,000
Contingency (20%)	\$ 3,933,000	\$ 3,933,000
Total Extramural Costs	\$23,600,400	\$20,683,000
INTRAMURAL COSTS		
1. EPA Direct Costs	\$ 150,000	\$ 250,000
2. EPA Indirect Costs	\$ 150,000	\$ 250,000
Total Intramural Costs	\$ 300,000	\$ 500,000
PROJECT CEILING (including \$4 millions remedial investigation)	\$24,000,000	\$21,183,000

VI. DISPOSITION OF WASTES

ZAI materials and debris-related to ZAI (indoor) will be disposed at the Lincoln County Landfill Cell beginning November 2002. Other materials contaminated with asbestos are currently being disposed at the mine.